Data Submitted (UTC 11): 4/15/2021 12:18:20 AM
First name: California
Last name: Cattle Rancher
Organization:
Title:
Comments: My comments to some of the new sections of handbook, and reiteration of agreement with other valid comments not meant to plagiarize but echo the same thoughts, beginning with personal comments:
As a California rancher, I have seen the devastating effects of wildfire on the public lands of this state first hand. At home, with family, and in our own range. Millions of acres burned beyond recognition, wildlife and riparian areas destroyed beyond belief, and more tragically, human life lost. To the commenters who choose to say things such cattle are ruining the public lands, and people like me are "cattle barons" or a "welfare rancher" should take into consideration that the cattle eat the grass and underbrush that fuel these huge wildfires. They are the key in preserving the forests and wildlife that we all hold so dear. There is a functional relationship between humans and rangeland ecosystems. When the forests are left alone or mismanaged, we have learned that we will simply watch them burn to nothing. I appreciate having the opportunity to comment and appreciate the diligent work of the forest service employees.

I do not agree with 17.1, if an allotment owner doesn't stock their range with 90% of cattle after a non use amount of time, that the numbers are decreased permanently. Nor do I agree with decreasing the years of non use. Major drought conditions in California can decrease a ranchers ability to hold the appropriate numbers over winter, therefore decreasing allotment numbers. It can take time to increase numbers again with quality cattle that have learned how to utilize the range.

Vacant Allotments Language in this section implies that completing environmental analysis and decisions on active allotments is necessarily a higher priority than completing analysis on vacant allotments. Due to resource constraints, completion of environmental analysis on active allotments is often delayed by many years. This hierarchy means that, effectively, it is nearly impossible to complete analysis on vacant allotments, thereby making them available to qualified applicants. I urge the insertion of language that would make environmental analysis on vacant allotment for which there is demonstrated interest in a term permit a higher priority than analysis on active permits that do not have a demonstrated resource need for timely analysis.

I strongly support the emphasis on the closing of allotments as being a practice that that should not be employed except in the most unusual of situations and that it should not be an administrative decision. It has been our experience that allotment closures effectively become permanent.
I appreciate the clarification of the purpose of AOI and the emphasis that they are not open to the public. This will serve to assure that there is full and honest discussion of all factors that will affect the grazing plan for the upcoming season.

16.2 Suspension or Cancellation of Grazing Permits Due to Non-Compliance with Permit Terms and Conditions
There are clearly conditions, as identified in this section, under which a full or partial cancellation of a permit is justified and necessary. However, it is important to recognize that permittee actions or inactions that result in suspensions or cancellations and the severity of the action taken by the responsible official may, in some instances be the result of a very untenable working relationship that develops between a permittee and a local FS officer for which either or both may share responsibility.

My recommendations for the Term Grazing Permits with On/Off Provisions are to leave the directives as they are currently written and not to adopt the proposed changes for Term Grazing Permits with On/Off Provisions.